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18	Counsel for Defendant Google LLC		
19	LIMITED STATES	DICTRICT COURT	
20	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION		
21	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER	Case No. 4:20-cv-03664-YGR-SVK	
22	CASTILLO, and MONIQUE TRUJILLO,	DECLARATION OF JONATHAN TSE IN	
23	individually and on behalf of themselves and all others similarly situated,	SUPPORT OF GOOGLE LLC'S MOTION TO SEAL PORTIONS OF GOOGLE LLC'S	
24	Plaintiffs, v.	RESPONSE TO PLAINTIFFS' RENEWED REQUEST TO DEPOSE GOOGLE CEO	
25		SUNDAR PICHAI (DKT. 635)	
26	GOOGLE LLC,	Judge: Hon. Susan van Keulen, USMJ	
27	Defendant.		
28			
20			

Case No. 4:20-cv-03664-YGR-SVK

TSE DECLARATION ISO GOOGLE'S ADMINISTRATIVE MOTION TO SEAL

I, Jonathan Tse, declare as follows:

1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 582.
- 3. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Document	Basis for Sealing
Google LLC's Response to	The information requested to be sealed contains Google's
Plaintiffs' Renewed Request to	highly confidential and proprietary information regarding
Depose Google CEO Sundar	highly sensitive features of Google's internal systems and
Pichai (Dkt. 635)	operations, including various types of Google's internal
	projects and their proprietary functionalities, that Google
Pages 3:15-16, 3:24, 4:2	maintains as confidential in the ordinary course of its
	business and is not generally known to the public or
	Google's competitors. Such confidential and proprietary
	information reveals Google's internal strategies, system
	designs, and business practices for operating and maintaining many of its important services, and falls within
	the protected scope of the Protective Order entered in this
	action. See Dkt. 81 at 2-3. Public disclosure of such
	confidential and proprietary information could affect
	Google's competitive standing as competitors may alter
	their systems and practices relating to competing products.
	It may also place Google at an increased risk of
	cybersecurity threats, as third parties may seek to use the
	information to compromise Google's internal practices
	relating to competing products.
Exhibit 2	The information requested to be sealed contains Google's
5/6/22 Twohill Depo Tr. Excerpts	highly confidential and proprietary information regarding
	highly sensitive features of Google's internal systems and
Pages 7:11, 126:2-3, 126:7,	operations, including various types of Google's internal
126:10-16, 127:6, 127:8	projects and proposals, and their proprietary functionalities,
	as well as internal metrics, that Google maintains as
	confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
	Such confidential and proprietary information reveals
	Google's internal strategies, system designs, and business
	Google's memar strategies, system designs, and business

1		practices for operating and maintaining many of its
		important services, and falls within the protected scope of
2		the Protective Order entered in this action. See Dkt. 81 at 2-
3		3. Public disclosure of such confidential and proprietary
		information could affect Google's competitive standing as
4		competitors may alter their systems and practices relating to competing products. It may also place Google at an
5		increased risk of cybersecurity threats, as third parties may
		seek to use the information to compromise Google's internal
6		practices relating to competing products.
7	Exhibit 3	The information requested to be sealed contains Google's
´	2/18/22 McClelland Depo Tr.	highly confidential and proprietary information regarding
8	Excerpts	highly sensitive features of Google's internal systems and
9	D 20:16 20 20:2 11 20:14 17	operations, including various types of Google's internal
1	Pages 28:16-20, 29:3-11, 29:14-17, 30:5, 106:10-13, 107:3, 107:5-15,	projects and proposals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course
10	107:18-19, 108:5-6, 113:4, 118:2,	of its business and is not generally known to the public or
11	118:7, 118:12, 118:15-16, 118:23,	Google's competitors. Such confidential and proprietary
11	119:12-14	information reveals Google's internal strategies, system
12		designs, and business practices for operating and
13		maintaining many of its important services, and falls within
13		the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
14		confidential and proprietary information could affect
15		Google's competitive standing as competitors may alter
13		their systems and practices relating to competing products.
16		It may also place Google at an increased risk of
17		cybersecurity threats, as third parties may seek to use the
1/		information to compromise Google's internal practices
18	Exhibit 5	relating to competing products. The information requested to be sealed contains Google's
10	11/19/21 Adhya Depo Tr. Excerpts	highly confidential and proprietary information regarding
19	11/19/21 / Kanya Bepo 11. Excelpts	highly sensitive features of Google's internal systems and
20	Pages 7:17	operations, including Google's internal project name, that
21		Google maintains as confidential in the ordinary course of
21		its business and is not generally known to the public or
22		Google's competitors. Such confidential and proprietary
22		information reveals Google's internal strategies, system designs, and business practices for operating and
23		maintaining many of its important services, and falls within
24		the protected scope of the Protective Order entered in this
25		action. See Dkt. 81 at 2-3. Public disclosure of such
25		confidential and proprietary information could affect
26		Google's competitive standing as competitors may alter
27		their systems and practices relating to competing products. It may also place Google at an increased risk of
27		cybersecurity threats, as third parties may seek to use the
28		of consecuting amounts, as time parties may seek to use the

1 2	information to compromise Google's internal practices relating to competing products.			
3				
4	4. Google's request is narrowly tailored in order to protect its confidential information.			
5	These redactions are limited in scope and volume. Because the proposed redactions are narrowly			
6	tailored and limited to portions containing Google's highly-confidential or confidential information,			
7	Google requests that the portions of the aforementioned documents be redacted from any public			
8	version of those documents.			
	3. Google does not seek to redact of the under sear any of the remaining portions of			
9	Google ELE's Response to Frankfills Reflewed Request to Depose Google CLO Sundar Fichar			
10	(Dkt. 635) not indicated in the table above.			
11	I declare under penalty of perjury of the laws of the United States that the foregoing is true			
12	and correct. Executed in San Francisco, Camorina on August 4, 2022.			
13				
14	DATED: August 4, 2022 QUINN EMANUEL URQUHART & SULLIVAN, LLP			
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17	By /s/ Jonathan Tse Jonathan Tse			
18	Attorney for Defendant			
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	3 Case No. 4:20-cv-03664-YGR-SVK			